

# EXHIBIT C

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MARICEL MARCIAL,	)
	)
Plaintiff,	)
	) Civil Action No.
vs.	) 16-CV-06109
	)
RUSH UNIVERSITY MEDICAL	)
CENTER, et al.,	)
	)
Defendants.	)

The continued deposition of  
MARICEL MARCIAL, taken in the above-entitled  
cause before Teresa Volpentesta, a notary public  
within and for the County of Cook and State of  
Illinois, taken pursuant to the Federal Rules of  
Civil Procedure for the United States District  
Courts, at Suite 2200, 120 South Riverside  
Plaza, Chicago, Illinois, on the 4th day of  
April, A.D. 2018, at 2:08 o'clock p.m.

1 Q. Did you talk to him about any  
2 documents?

3 A. I think so. Maybe I mentioned about  
4 evaluations.

5 Q. Okay. Do you know was a  
6 transcription of the tape recording you made of  
7 the meeting in October of 2013 with Dr. Kremer  
8 and Mary Johnson?

9 Was there a transcription made of  
10 that recording?

11 A. Like recently we had to transcribe it  
12 for your -- for this purpose.

13 Q. For what purpose?

14 A. For this litigation.

15 Q. What do you mean?

16 A. We listened to it and we transcribed  
17 it and gave it to our lawyer.

18 Q. Why did you transcribe it?

19 A. Because we were told to write it out.

20 Q. By whom?

21 MS. SIEGEL: I am going to instruct the  
22 witness not to divulge any attorney/client  
23 communications.

24

1           MR. LAND: Well, she kind of already did if  
2   that's something you told her.

3   BY MS. LAND:

4           Q.     I just want to know -- you just said  
5   someone told you to create a transcription. Who  
6   told you that?

7           A.     Our lawyer advised us to --

8           MS. SIEGEL: Don't disclose any legal  
9   advice.

10   BY MR. LAND:

11          Q.     Did you talk to anyone else about the  
12   transcription of that record -- recording?

13          A.     No.

14          Q.     Do you know if Dr. Farmilant has a  
15   copy of that transcription?

16          A.     Not that I am aware of.

17          Q.     Did you tell Dr. Farmilant that you  
18   believe that stress contributed a great deal to  
19   the decline in your performance?

20          A.     Yes, I think I mentioned that to him.

21          Q.     And by that, you meant your clinical  
22   performance at Rush?

23          A.     No. By that I mean the bullying and  
24   the harassment that I was getting from the